

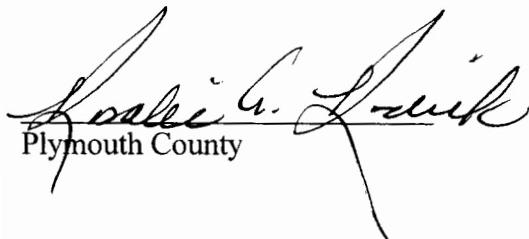
UNITED STATES DISTRICT COURT FILED
DISTRICT OF MASSACHUSETTS

2005 MAY 12 P 2:57

SCOTT RODGERS,)	UNITED STATES DISTRICT COURT
Plaintiff)	MASSACHUSETTS
v.)	COUNSEL CERTIFICATION
CORRECTION OFFICER ORCHID,)	PURSUANT TO LOCAL RULE
UNKNOWN CORRECTION OFFICER JOHN)	16.1(D)(3)
DOE, JOE WHITMORE, DR. HOWARD, JOHN)	C.A. No. 04-CV-11842-PBS
SMITH, PLYMOUTH COUNTY)	
Defendants)	
)	

In accordance with Local Rule 16.1(D)(3), the undersigned counsel as an authorized representative of Defendant Plymouth County, certify that counsel and parties have conferred with a view to establishing a budget for the costs of conducting the full course and various alternate courses of litigation and to consider the resolution of the litigation through the use of ADR process such as those outlined in Local Rule 16.1(D)(3)

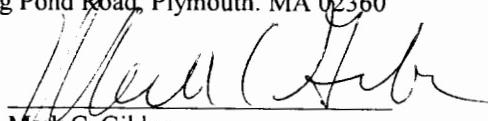
Respectfully submitted,
 The Defendant,
 Plymouth County,
 By its attorney,


 Jessica D. Hedges
 Plymouth County


 Mark C. Gildea BBO# 551127
 Clark, Balboni & Gildea, LLP
 126 Belmont Street
 Brockton, MA 02301
 Tel. 508.586.1411

CERTIFICATE OF SERVICE

I, Mark C. Gildea, Esq., hereby certify that on this 14th day of April, 2005, I served one true and correct copy of the Defendant's COUNSEL CERTIFICATION PURSUANT TO LOCAL RULE 16.1(D)(3), where unable to do so electronically, by United States First-Class Mail, postage prepaid, as follows: Jessica D. Hedges, Esq., Stephen Hrones, Esq., HRONES & GARRITY, Lewis Wharf-Bay 232, Boston, MA 02110-3927 and Patrick C. Lee, Esq., Plymouth County Sheriff's Department, 24 Long Pond Road, Plymouth, MA 02360


 Mark C. Gildea